

## **EXHIBIT H**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

In re Terrorist Attacks on September 11, 2001	03 MDL 1570 (GBD)(SN)  ECF Case
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This document relates to:

*Ashton, et al. v. al Qaeda Islamic Army, et al.*, 02-cv-6977 (GBD)(SN)

**DECLARATION OF PLAINTIFF EILEEN LYNCH IN SUPPORT  
OF APPLICATION FOR A FINAL JUDGMENT AGAINST TALIBAN AND  
MUHAMMAD OMAR**

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Eileen Lynch, pursuant to 28 U.S.C. § 1746, declares under the penalty of perjury under the laws of the United States of America, that the following is true and correct:

1. I am the court-appointed personal representative of the Estate of Farrell Lynch, who perished at the World Trade Center as a result of the terrorist attacks on September 11, 2001.

2. I submit this Declaration on my own behalf as the spouse of Farrell Lynch and on behalf of the only other New York State designated “heirs” of my late husband, our three children: Anne Lynch, Kathleen Lynch, and Meghan Lynch.

3. I can affirm to the Court that my deceased husband lived with me and my three children at a private home at 43 Seaspray Drive, Centerport, New York 11721 at the time of his death. I can further affirm that my children and I were the only “immediate family members” living with my husband and that no other family member lived with us (or was dependent on my husband – financially or emotionally) at the time of his death.

4. Finally, I can affirm that the death of my husband affected me and our children not only in the days following his death, but his death continues to adversely affect our emotional and financial condition up to and through the present day.

5. I am now represented by the Law Office of John P. Schurty, P.C. My prior lawyers obtained a default judgment for me personally and on behalf of my three children only for *solatium* damages.

6. My prior attorneys (Speiser Krause) did not seek a default judgment previously for the following damages: (a) the economic loss suffered by my late husband's Estate as a result of his death, or (b) for my late husband's conscious pain and suffering before his death (by previous court order: \$2 million per decedent). I am asking this Court to add these damage items to the default judgment entered against the Islamic Republic of Iran on my behalf and on behalf of my three daughters.

7. Annexed hereto is the Report of Dr. Gary Crakes summarizing the economic loss sustained by the Estate of Farrell Lynch as a result of his death. Dr. Crakes has opined that my husband's Estate sustained economic losses totaling \$18,289,314.

9. For the foregoing reasons, I ask that the Court deem my children and me as the only "immediate family members" of Farrell Lynch and thereafter enter a default judgment award in the amounts requested by our new attorney (and economist).

Dated: New York, New York  
December 20, 2019

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

  
Eileen Lynch

## EXHIBIT A: EILEEN LYNCH DECLARATION

Estate	Immediate Family Members (Heirs)	Relationship	Solatium Damages	Conscious Pain & Suffering	Economic Loss	TOTALS
<b>Estate of Farrell Lynch</b>	<b>Lynch, Eileen</b>	Spouse/PR	\$12,500,000.00	\$2,000,000.00	\$18,289,614.00	\$32,789,614.00
	<b>Lynch, Anne</b>	Child	\$8,500,000.00			\$8,500,000.00
	<b>Lynch, Kathleen</b>	Child	\$8,500,000.00			\$8,500,000.00
	<b>Lynch, Meaghan</b>	Child	\$8,500,000.00			\$8,500,000.00
<b>Total Judgment to Personal Representative for Entry of Partial Final Judgment Against Taliban and Muhammad Omar</b>						<b>\$58,289,614.00</b>

APPRAISAL OF ECONOMIC LOSS

Farrell Lynch

Prepared for: Jeanne M. O'Grady, Esq.  
SPEISER KRAUSE  
Counsellors at Law  
800 Westchester Avenue  
Suite 608  
Rye Brook, NY 10573

Prepared by: Gary M. Crakes, PhD

December 20, 2017

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**MAHER, CRAKES AND ASSOCIATES**

ECONOMIC CONSULTANTS

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JOHN MAHER, PhD  
1925 - 2005

GARY M. CRAKES, PhD

December 20, 2017

RE: Farrell Lynch

Jeanne M. O'Grady, Esq.  
SPEISER KRAUSE  
Counsellors at Law  
800 Westchester Avenue  
Suite 608  
Rye Brook, NY 10573

Dear Ms. O'Grady:

The following report on the economic loss of the above named is an objective estimate of the loss in this case, measured as scientifically and accurately as the data permit.

If you have questions about calculations or concepts or feel that additional aspects should be explored, please contact us. Exhibits I and II in this report are prepared to be suitable as enlargements for use at trial.

If the case is not settled, please schedule time for appearance at trial sufficiently in advance that we may plan accordingly.

Respectfully submitted,

A handwritten signature in dark ink, appearing to read "Gary M. Crakes". The signature is fluid and cursive, with the first name "Gary" being more prominent.

Gary M. Crakes, PhD

GMC:dc

Discussion of appraisal: Farrell Lynch

Farrell Lynch was born March 7, 1962 (1962.18) and died September 11, 2001 (2001.70) at age 39.52 years with life expectancy of 37.13 years and work-life to age 70 of 30.48 years. See Exhibit II.

In this appraisal of the economic loss of earning capacity, we have calculated the lifetime earnings of Farrell Lynch with work-life to age 70 based on a 2001 annual earnings rate of \$874,844. Calculation of the value of lifetime earnings based on a 2001 annual earnings rate of \$874,844 results in earnings loss for the 16.30 years in the past of \$17,572,869 with adjustment for each year in the past by the annual percentage change in general levels of earnings. Calculation of future discounted earnings assumes that the future average annual rate of growth of earnings will be equal to the discount rate. With this assumption and current estimated annual earnings of \$1,298,120, future discounted earnings are \$18,407,342. Total discounted lifetime earnings based on a 2001 annual earnings rate of \$874,844 are \$35,980,211. This value appears as the first entry to the summary, Exhibit I.

Further shown in the summary, Exhibit I, is a deduction for federal, state, and city income taxes of 45.00% of earnings. The percentage for federal income tax was obtained using tax rates for the years in the past and the tax rates from the federal personal income tax schedule displayed in Exhibit IV. (Exhibit V presents historical tax rates from 1947 to 2014 and demonstrates the relatively small percentage point changes in rates over time.) With the deduction for federal, state, and city income taxes, after-tax discounted economic loss is \$19,789,116.

Next shown in Exhibit I is a deduction of 10% of gross earnings as an allowance for personal maintenance expenses. (See Consumer Expenditures in 2015, U.S. Department of Labor, Bureau of Labor Statistics, April, 2017.) With this deduction, discounted economic loss is \$16,191,095.



Finally, we have included two additional values. First, we have included the value of fringe benefits calculated at 5% of earnings. (For the average benefit payments in the United States, see Exhibit VI with data from the Bureau of Labor Statistics, U.S. Department of Labor.) Second, we have included the value of Farrell Lynch's household services. Data for the estimate are presented in Exhibit VII and are derived from "Time Use During the Great Recession", Mark Aguiar, Erik Hurst, and Loukas Karabarbounis, American Economic Review, August, 2013 and wage rates from the Bureau of Labor Statistics, U.S. Department of Labor. Adjustment and application of the appropriate values provides an estimate of discounted loss of \$299,509, canceling future rates of increase by the discount rate. With the addition of these values, discounted economic loss is \$18,289,614. See Exhibit I.

It is our opinion that the discounted economic loss in this case is \$18,289,614.

## Summary of appraisal: Farrell Lynch

	<u>Discounted values</u>
I Basic earnings based on 2001 annual earnings rate of \$874,844	\$35,980,211
II Less federal, state, and city income taxes at 45% of earnings	<u>-16,191,095</u>
Subtotal	\$19,789,116
III Less personal maintenance at 10% of earnings	<u>- 3,598,021</u>
Subtotal	\$16,191,095
IV Plus value of fringe benefits	<u>1,799,010</u>
Subtotal	\$17,990,105
V Plus value of household services	<u>299,509</u>
Total net discounted economic loss	\$18,289,614

## WORK-LIFE AND LIFE EXPECTANCY

Farrell Lynch

	<u>Year and fractional equivalent</u>	<u>Number of years</u>
A. Date of birth:		
March 7, 1962	1962.18	
B. As of date of death:		
September 11, 2001	2001.70	
1. Age		39.52
2. Work-life to age 70		30.48
3. Life expectancy		37.13

## Source:

3. National Vital Statistics Reports, 2001,  
U. S. Department of Health and Human Services,  
National Center for Health Statistics, Volume 52, Number 14,  
February 18, 2004.

## Exhibit III

TABLE 98. Average Hourly Earnings of Production or Nonsupervisory Workers<sup>1</sup> on Private Nonagricultural Payrolls, by Industry Division, 1932-74

(In dollars)

Year and month	Total private	Mining	Contract construction	Manufacturing			Manufacturing excluding overtimes	Transportation and public utilities	Wholesale and retail trade			Finance, insurance, and real estate <sup>2</sup>	Services
				Total <sup>3</sup>	Durable goods	Nondurable goods			Total	Wholesale	Retail		
1932				0.441	0.492	0.412							
1933				.437	.467	.419							
1934				.526	.580	.508							
1935				.544	.571	.520							
1936				.550	.580	.519			0.610				
1937				.617	.667	.566			.628				
1938				.620	.679	.572			.658				
1939				.627	.691	.571			.674				
1940				.655	.716	.590			.683				
1941				.726	.799	.627	0.691		.711			0.484	
1942				.851	.937	.709	.793		.763			.494	
1943				.857	1.048	.787	.881		.828			.518	
1944				1.011	1.105	.844	.933		.858			.559	
1945				1.016	1.090	.886	.949		.898			.606	
1946				1.075	1.144	.995	1.035		.948			.653	
1947	1.131	1.489	1.541	1.217	1.278	1.145	1.18		.990	1.107	.797		
1948	1.225	1.664	1.713	1.328	1.395	1.260	1.29		1.220	1.308	.838	1.140	
1949	1.717	1.792	1.792	1.378	1.453	1.295	1.34		1.010	1.308	.901	1.200	
1950	1.335	1.772	1.863	1.440	1.519	1.347	1.39		1.060	1.360	.951	1.280	
1951	1.45	1.93	2.02	1.65	1.65	1.44	1.51		1.100	1.477	.983	1.340	
1952	1.82	2.01	2.13	1.65	1.75	1.51	1.59		1.18	1.52	1.06	1.45	
1953	1.61	2.14	2.28	1.74	1.86	1.58	1.68		1.23	1.61	1.09	1.51	
1954	1.65	2.14	2.39	1.78	1.90	1.62	1.73		1.30	1.70	1.16	1.58	
1955	1.71	2.20	2.45	1.86	1.99	1.67	1.79		1.35	1.76	1.20	1.65	
1956	1.80	2.33	2.57	1.95	2.08	1.77	1.89		1.40	1.83	1.25	1.70	
1957	1.89	2.46	2.71	2.05	2.19	1.85	1.99		1.47	1.94	1.30	1.78	
1958	1.95	2.47	2.82	2.11	2.26	1.91	2.05		1.54	2.02	1.37	1.84	
1959	2.02	2.56	2.93	2.19	2.36	1.98	2.12		1.60	2.09	1.42	1.89	
1960	2.09	2.61	3.08	2.26	2.43	2.05	2.20		1.66	2.18	1.47	1.95	
1961	2.14	2.64	3.20	2.32	2.49	2.11	2.25		1.71	2.24	1.52	2.02	
1962	2.22	2.70	3.31	2.39	2.56	2.17	2.31		1.76	2.31	1.56	2.09	
1963	2.28	2.76	3.41	2.45	2.63	2.22	2.37		1.83	2.37	1.63	2.17	
1964	2.36	2.81	3.55	2.53	2.71	2.29	2.44		1.89	2.45	1.68	2.25	
1965	2.43	2.92	3.70	2.61	2.79	2.36	2.51	2.89	1.96	2.52	1.75	2.30	1.94
1966	2.56	3.05	3.89	2.72	2.90	2.45	2.59	3.03	2.03	2.61	1.82	2.39	2.05
1967	2.68	3.19	4.11	2.83	3.00	2.57	2.7	3.11	2.13	2.73	1.91	2.47	2.17
1968	2.85	3.35	4.41	3.01	3.19	2.74	2.88	3.24	2.24	2.88	2.01	2.58	2.29
1969	3.04	3.61	4.79	3.19	3.38	2.91	3.06	3.42	2.40	3.05	2.16	2.76	2.42
1970	3.22	3.85	5.24	3.38	3.55	3.08	3.24	3.64	2.55	3.23	2.30	2.98	2.61
1971	3.44	4.08	5.69	3.57	3.79	3.26	3.44	3.85	2.71	3.44	2.44	3.08	2.81
1972	3.67	4.41	6.03	3.81	4.06	3.47	3.66	4.21	2.85	3.67	2.57	3.27	3.02
1973	3.92	4.72	6.38	4.07	4.33	3.68	3.89	4.64	3.01	3.88	2.70	3.42	3.23
1974	4.22	5.20	6.76	4.40	4.68	3.93	4.23	5.03	3.20	4.12	2.87	3.57	3.46
								5.40	3.47	4.49	3.10	3.81	3.74

<sup>1</sup> Data relate to production workers in mining and manufacturing; to construction workers in contract construction; and to nonsupervisory workers in transportation and public utilities; wholesale and retail trade; finance, insurance, and real estate; and services.

<sup>2</sup> Prior data are as follows:

1909.. 0.191	1922.. 0.482	1927.. 0.544
1914.. .221	1923.. .516	1928.. .556
1919.. .472	1924.. .541	1929.. .560
1920.. .549	1925.. .541	1930.. .546
1921.. .509	1926.. .542	1931.. .509

<sup>3</sup> Excludes data on nonoffice salespersons.

<sup>4</sup> Beginning 1947, includes data on eating and drinking places.

<sup>5</sup> 11-month average.

<sup>6</sup> Prior to January 1986, data were based on the application of adjustment factors to gross average hourly earnings. (For a detailed description see the *Monthly Labor Review*, May 1950, pp. 527-540; reprint available, serial No. R 2020.)

Note: Data include Alaska and Hawaii beginning 1959.

## Private Sector

1975	\$ 4.53	1993	\$11.03	2011	\$19.46
1976	4.86	1994	11.32	2012	19.77
1977	5.25	1995	11.64	2013	20.14
1978	5.69	1996	12.03	2014	20.60
1979	6.16	1997	12.49	2015	21.03
1980	6.66	1998	13.00	2016	21.56
1981	7.25	1999	13.47		
1982	7.68	2000	14.00		
1983	8.02	2001	14.53		
1984	8.33	2002	14.95		
1985	8.58	2003	15.35		
1986	8.76	2004	15.67		
1987	8.98	2005	16.11		
1988	9.29	2006	16.76		
1989	9.66	2007	17.43		
1990	10.19	2008	18.08		
1991	10.50	2009	18.62		
1992	10.76	2010	19.04		

## Service Industry

1975	\$4.02	1993	\$10.60	2011	\$19.21
1976	4.31	1994	10.87	2012	19.52
1977	4.65	1995	11.19	2013	19.91
1978	4.99	1996	11.57	2014	20.36
1979	5.36	1997	12.05	2015	20.83
1980	5.85	1998	12.59	2016	21.34
1981	6.41	1999	13.07		
1982	6.92	2000	13.60		
1983	7.30	2001	14.16		
1984	7.64	2002	14.56		
1985	7.95	2003	14.96		
1986	8.16	2004	15.26		
1987	8.49	2005	15.71		
1988	8.88	2006	16.42		
1989	9.39	2007	17.11		
1990	9.71	2008	17.77		
1991	10.05	2009	18.35		
1992	10.33	2010	18.78		

Source: Bureau of Labor Statistics, U. S. Department of Labor

**Federal Income Tax Schedules for Individuals: Tax tables,  
standard deductions and personal exemptions, 2016 and 2017**

2016		2017	
Tax Rates for Married Couples Filing Jointly			
Taxable Income	Rate	Taxable Income	Rate
\$0-\$18,550	10%	\$0-\$18,650	10%
\$18,550-\$75,300	15%	\$18,650-\$75,900	15%
\$75,300-\$151,900	25%	\$75,900-\$153,100	25%
\$151,900-\$231,450	28%	\$153,100-\$233,350	28%
\$231,450-\$413,350	33%	\$233,350-\$416,700	33%
\$413,350-\$466,950	35%	\$416,700-\$470,700	35%
Over \$466,950	39.60%	Over \$470,700	39.60%

Tax Rates for Individuals Filing Single Returns			
Taxable Income	Rate	Taxable Income	Rate
\$0-\$9,275	10%	\$0-\$9,325	10%
\$9,275-\$37,650	15%	\$9,325-\$37,950	15%
\$37,650-\$91,150	25%	\$37,950-\$91,900	25%
\$91,150-\$190,150	28%	\$91,900-\$191,650	28%
\$190,150-\$413,350	33%	\$191,650-\$416,700	33%
\$413,350-\$415,050	35%	\$416,700-\$418,400	35%
Over \$415,050	39.60%	Over \$418,400	39.60%

Tax Rates for Individuals Filing as Head of Household			
Taxable Income	Rate	Taxable Income	Rate
\$0-\$13,250	10%	\$0-\$13,350	10%
\$13,250-\$50,400	15%	\$13,350-\$50,800	15%
\$50,400-\$130,150	25%	\$50,800-\$131,200	25%
\$130,150-\$210,800	28%	\$131,200-\$212,500	28%
\$210,800-\$413,350	33%	\$212,500-\$416,700	33%
\$413,350-\$441,000	35%	\$416,700-\$444,550	35%
Over \$441,000	39.60%	Over \$444,550	39.60%

Tax Rates for Married Individuals Filing Separately			
Taxable Income	Rate	Taxable Income	Rate
\$0-\$9,275	10%	\$0-\$9,325	10%
\$9,275-\$37,650	15%	\$9,325-\$37,950	15%
\$37,650-\$75,950	25%	\$37,950-\$76,550	25%
\$75,950-\$115,725	28%	\$76,550-\$116,675	28%
\$115,725-\$206,675	33%	\$116,675-\$208,350	33%
\$206,675-\$233,475	35%	\$208,350-\$235,350	35%
Over \$233,475	39.60%	Over \$235,350	39.60%

Standard Deduction		Personal Exemption	
	2016	2017	
Married, joint	\$12,600	\$12,700	\$4,050
Single	6,300	6,350	\$4,050
Head of household	9,300	9,350	
Married, separate	6,300	6,350	

Taxable returns: Adjusted gross income (AGI), income tax,  
and tax ratio, 1947- 2014

Year	Adjusted gross income (AGI) billions of \$	Income tax in billions of \$	Ratio of tax to AGI	Year	Adjusted gross income (AGI) billions of \$	Income tax in billions of \$	Ratio of tax to AGI
1947	135.3	18.1	.1336	1988	2,989.9	411.8	.1377
1948	142.1	15.4	.1087	1989	3,158.3	432.1	.1368
1949	138.7	14.5	.1049	1990	3,298.9	446.3	.1353
1950	158.5	18.4	.1160	1991	3,335.2	447.2	.1341
1951	185.1	24.2	.1309	1992	3,483.9	474.9	.1363
1952	198.5	27.8	.1401	1993	3,564.0	500.7	.1405
1953	212.4	29.4	.1386	1994	3,736.6	532.6	.1425
1954	209.7	26.7	.1272	1995	4,007.6	586.1	.1462
1955	229.6	29.6	.1290	1996	4,341.9	655.4	.1510
1956	249.6	32.7	.1312	1997	4,785.2	727.3	.1520
1957	262.2	34.4	.1312	1998	5,160.2	783.5	.1518
1958	262.2	34.3	.1310	1999	5,580.8	870.9	.1561
1959	287.8	38.6	.1332	2000	6,083.3	980.5	.1612
1960	297.2	39.5	.1330	2001	5,847.1	887.9	.1519
1961	311.3	42.2	.1356	2002	5,641.1	797.0	.1413
1962	330.6	44.9	.1358	2003	5,746.6	748.0	.1302
1963	350.4	48.2	.1376	2004	6,265.5	832.0	.1328
1964	376.0	47.2	.1254	2005	6,856.7	934.8	.1363
1965	400.3	49.5	.1209	2006	7,439.5	1,023.9	.1376
1966	450.2	56.1	.1246	2007	8,072.3	1,115.8	.1382
1967	487.4	62.9	.1291	2008	7,583.5	1,031.6	.1360
1968	538.3	76.6	.1424	2009	6,777.7	865.9	.1278
1969	588.2	86.6	.1472	2010	7,246.2	951.7	.1313
1970	610.3	83.8	.1370	2011	7,693.2	1,045.5	.1359
1971	651.3	85.2	.1309	2012	8,442.2	1,188.0	.1407
1972	717.4	93.6	.1300	2013	8,426.0	1,218.5	.1446
1973	799.7	108.1	.1350	2014	9,102.6	1,355.3	.1489
1974	800.2	123.7	.1410				
1975	893.3	124.4	.1385				
1976	1,004.4	140.8	.1402				
1977	1,097.7	158.5	.1444				
1978	1,241.2	186.7	.1504				
1979	1,402.2	213.3	.1521				
1980	1,556.1	249.1	.1601				
1981	1,721.2	282.3	.1640				
1982	1,803.8	277.6	.1539				
1983	1,895.2	274.2	.1447				
1984	2,110.5	304.0	.1440				
1985	2,259.0	321.9	.1425				
1986	2,440.2	360.6	.1478				
1987	2,700.8	367.5	.1361				

Source: Annual issues of Individual Income Tax Returns,  
Statistics of Income, Internal Revenue Service



Table 1. Employer costs per hour worked for employee compensation and costs as a percent of total compensation: civilian workers, by major occupational and industry group, September 2016

Compensation component	Occupational group							
	All workers <sup>1</sup>		Management, professional, and related		Sales and office		Service	
	Cost	Percent	Cost	Percent	Cost	Percent	Cost	Percent
Total compensation .....	\$34.15	100.0	\$58.57	100.0	\$24.95	100.0	\$17.79	100.0
Wages and salaries .....	23.42	68.8	38.55	65.8	17.56	70.4	12.72	71.5
Total benefits .....	10.73	31.4	18.01	31.5	7.38	29.5	5.07	28.5
Paid leave .....	2.36	6.9	4.49	7.7	1.65	6.6	0.89	5.0
Vacation .....	1.10	3.4	2.17	3.8	0.82	3.3	0.42	2.4
Holiday .....	0.71	2.1	1.30	2.3	0.50	2.0	0.26	1.5
Sick .....	0.35	1.0	0.72	1.3	0.21	0.9	0.14	0.8
Personal .....	0.14	0.4	0.29	0.5	0.11	0.4	0.05	0.3
Supplemental pay .....	1.05	3.1	2.02	3.6	0.56	2.3	0.29	1.6
Overtime and premium <sup>4</sup> .....	0.26	0.8	0.17	0.3	0.16	0.6	0.15	0.8
Shift differentials .....	0.06	0.2	0.08	0.1	0.02	0.1	0.05	0.3
Nonproduction bonuses .....	0.74	2.2	1.77	3.1	0.42	1.7	0.09	0.5
Insurance .....	3.00	8.8	4.60	8.1	2.37	9.5	1.41	7.9
Life .....	0.04	0.1	0.08	0.1	0.03	0.1	0.02	0.1
Health .....	2.85	8.4	4.36	7.7	2.27	9.1	1.37	7.7
Short-term disability .....	0.05	0.2	0.09	0.2	0.04	0.2	0.02	0.1
Long-term disability .....	0.06	0.1	0.08	0.1	0.03	0.1	( <sup>5</sup> )	( <sup>6</sup> )
Retirement and savings .....	1.78	5.2	3.35	5.9	0.90	3.6	0.79	4.4
Defined benefit .....	1.11	3.2	2.08	3.7	0.44	1.8	0.84	3.5
Defined contribution .....	0.66	1.9	1.27	2.2	0.45	1.8	0.15	0.9
Legally required benefits .....	2.56	7.5	3.55	6.3	1.88	7.5	1.69	9.5
Social Security and Medicare .....	1.89	5.5	3.00	5.3	1.48	5.8	1.08	5.9
Social Security <sup>7</sup> .....	1.50	4.4	2.35	4.1	1.17	4.7	0.85	4.8
Medicare .....	0.39	1.1	0.65	1.1	0.29	1.1	0.21	1.2
Federal unemployment insurance .....	0.03	0.1	0.02	( <sup>6</sup> )	0.04	0.1	0.04	0.2
State unemployment insurance .....	0.17	0.5	0.18	0.3	0.16	0.6	0.15	0.9
Workers' compensation .....	0.47	1.4	0.37	0.7	0.23	0.9	0.44	2.5

  

Compensation component	Occupational group				Industry group			
	Natural resources, construction, and maintenance		Production, transportation, and material moving		Goods-producing <sup>2</sup>		Service-providing <sup>3</sup>	
	Cost	Percent	Cost	Percent	Cost	Percent	Cost	Percent
Total compensation .....	\$34.94	100.0	\$27.46	100.0	\$39.02	100.0	\$33.30	100.0
Wages and salaries .....	23.34	66.8	18.07	65.8	25.88	66.3	22.99	69.0
Total benefits .....	11.61	33.2	9.38	34.2	13.14	33.7	10.31	31.0
Paid leave .....	1.89	5.3	1.84	6.0	2.83	6.5	2.33	7.0
Vacation .....	0.94	2.7	0.82	3.0	1.31	3.4	1.13	3.4
Holiday .....	0.81	1.8	0.55	2.0	0.88	2.2	0.68	2.0
Sick .....	0.21	0.6	0.20	0.7	0.26	0.6	0.37	1.1
Personal .....	0.10	0.3	0.07	0.3	0.10	0.3	0.15	0.5
Supplemental pay .....	1.03	3.0	0.99	3.6	1.49	3.8	0.97	2.9
Overtime and premium <sup>4</sup> .....	0.71	2.0	0.55	2.0	0.88	1.6	0.20	0.6
Shift differentials .....	0.05	0.1	0.08	0.3	0.08	0.2	0.05	0.2
Nonproduction bonuses .....	0.27	0.8	0.36	1.3	0.84	2.1	0.72	2.2
Insurance .....	3.26	9.3	2.88	10.8	3.67	9.4	2.88	8.7
Life .....	0.04	0.1	0.04	0.1	0.06	0.2	0.04	0.1
Health .....	3.11	8.9	2.82	10.3	3.47	8.9	2.75	8.2
Short-term disability .....	0.06	0.2	0.06	0.2	0.06	0.2	0.05	0.1
Long-term disability .....	0.03	0.1	0.06	0.2	0.05	0.1	0.04	0.1
Retirement and savings .....	2.10	6.0	1.22	4.5	2.16	5.6	1.69	5.1
Defined benefit .....	1.49	4.3	0.72	2.6	1.21	3.1	1.09	3.3
Defined contribution .....	0.61	1.7	0.50	1.8	0.95	2.4	0.60	1.8
Legally required benefits .....	3.35	9.8	2.55	9.3	3.29	8.4	2.43	7.3
Social Security and Medicare .....	1.96	5.6	1.53	5.6	2.19	5.6	1.83	5.5
Social Security <sup>7</sup> .....	1.59	4.5	1.23	4.5	1.76	4.5	1.45	4.4
Medicare .....	0.38	1.1	0.30	1.1	0.43	1.1	0.38	1.1
Federal unemployment insurance .....	0.03	0.1	0.03	0.1	0.03	0.1	0.03	0.1
State unemployment insurance .....	0.25	0.7	0.16	0.7	0.23	0.6	0.16	0.5
Workers' compensation .....	1.11	3.2	0.60	2.9	0.84	2.1	0.41	1.2

<sup>1</sup> Includes workers in the private nonfarm economy excluding households and the public sector excluding the Federal government.<sup>2</sup> Includes mining, construction, and manufacturing. The agriculture, forestry, fishing, and hunting sector is excluded.<sup>3</sup> Includes utilities; wholesale trade; retail trade; transportation and warehousing; information; finance and insurance; real estate and rental and leasing; professional and technical services; management of companies and enterprises; administrative and waste services; educational services; health care and social assistance; arts, entertainment and recreation; accommodation and food services; other services, except public administration; and public administration.<sup>4</sup> Includes premium pay (such as overtime, weekends, and holidays) for work in addition to the regular work schedule.<sup>5</sup> Cost per hour worked is \$0.01 or less.<sup>6</sup> Less than .05 percent.<sup>7</sup> Social Security refers to the Old-Age, Survivors, and Disability Insurance (OASDI) program.Source: Employer Costs for Employee Compensation - September 2016,  
U. S. Department of Labor, Bureau of Labor Statistics,  
December, 2016

## Estimated annual value of household services

	<u>Hours per week spent in non-market work<sup>1</sup></u>	<u>Hourly wage<sup>2</sup></u>	<u>Annual dollar value (2010\$)</u>
MALES	14.13	\$10.17	\$ 7,472
FEMALES	22.12	\$10.17	\$11,698

	<u>Hours per week spent in child care<sup>1</sup></u>	<u>Hourly wage<sup>2</sup></u>	<u>Annual dollar value (2010\$)</u>
MALES	2.89	\$10.17	\$ 1,528
FEMALES	6.42	\$10.17	\$ 3,395

## Sources:

1. "Time Use During the Great Recession", Mark Aguiar, Erik Hurst, and Loukas Karabarbounis, American Economic Review, August, 2013, 103(5): 1664-1696 and Online Appendix.
2. Mean hourly wage, maids and housekeeping cleaners, Occupational Employment and Wages, 2010, Bureau of Labor Statistics, United States Department of Labor.



## Curriculum Vitae

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Birthdate: July 2, 1953

Home: 860 Ward Lane  
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### Education

Ph.D. (Economics) 1984, University of Connecticut

M.A. (Economics) 1976, University of Connecticut

B.A. (Economics) 1975, Central Connecticut State College

### Fellowships and Honors

2017 Biographical listing, Who's Who in America

2004 Honored, Trial Lawyers Care, Association of Trial Lawyers of America,  
for pro bono economic services, September 11<sup>th</sup> Victim Compensation Fund

1998 School of Business Outstanding Teacher Award

1987 University Teacher of the Year Award

1985 Member, State of Connecticut Senior Economist Examination Committee

1983 Richard D. Irwin Fellowship

1983 University of Connecticut Dissertation Fellowship

1975-1976 University of Connecticut Pre-doctoral Fellowship

### Professional Organizations

American Economic Association

Eastern Economic Association

Omicron Delta Epsilon

National Association of Forensic Economists

American Academy of Economic and Financial Experts

American Association of University Professors

National Association of Business Economics

### Professional Experience

1981 - Economic consultant, Maher, Crakes, and Associates

2011 - Professor Emeritus, Department of Economics and Finance, School of  
Business, Southern Connecticut State University

1989 - 2011 Professor, Department of Economics and Finance, School of  
Business, Southern Connecticut State University

1991-1995 Chairman, Department of Economics and Finance, School of Business,  
Southern Connecticut State University

January 1988-June 1988 Visiting Professor, Department of Behavioral Science  
and Community Health, School of Dental Medicine, University of  
Connecticut Health Center

September 1985-August 1989 Associate Professor, School of Business, Southern  
Connecticut State University (tenured, 1986)

August 1980 - August 1985 Assistant Professor, School of Business, Southern  
Connecticut State University

January 1979-May 1980 Instructor, University of Connecticut (Hartford)

June 1976-December 1978 Research Assistant, University of Connecticut Health  
Center. Research Assistant, School of Agriculture, University of Connecticut

Publications

Journals

- Crakes, G. and Cottrill, M. "The Connecticut State Income Tax: Progressive, Regressive, and Proportional," Journal of the American Academy of Business, (September, 2007)
- Cottrill, M. and Crakes, G. "A Different Look at "Pay for Performance": Returns to Bench Strength in the NFL," The Business Review, Cambridge, (December, 2004).
- Beazoglou, T., Crakes, G., Doherty, N. and Heffley, D. "Determinants of Dentists' Geographic Distribution," Journal of Dental Education (November, 1992)
- Doherty, N. and Crakes, G. "Estimating the Costs of Public Dental Programs: Mobile Clinics," Community Dental Health (Spring, 1987).
- Crakes, G. "A Comparison of Economic Estimates of Loss with Jury Awards and Pre-verdict Settlements," Business Journal (Fall, 1985).
- Doherty, N. and Crakes, G. "Economic Specification of Cost Estimates in Dental Programs," Journal of Dental Research (June, 1985).
- Doherty, N. and Crakes, G. "Adjusting Social Program Costs for Research and Evaluation Activities," Evaluation Review (August, 1980).
- Doherty, N. and Crakes, G. "Commentary: Reply to Joan Quinn," Inquiry (Summer, 1980).
- Doherty, N., Horowitz, P. and Crakes, G. "Real Costs of Dental Care in Private and Public Practice," Medical Care (January, 1980).
- Doherty, N. and Crakes, G. "The Impact of a Change in Regulation on Costs in an Experimental Program," Inquiry (Summer, 1979).

Proceedings

- Crakes, G. with Cottrill, M. "The Growth of Student Indebtedness and the Role of Higher Education as a U.S. Response to Globalization," Proceedings of the Global Conference on Business & Economics, Association for Business & Economics Research, October, 2007
- Crakes, G. with Cottrill, M. "The Rising Relative Price of Higher Education and the U.S. Response to Offshore Outsourcing," Proceedings of the New England Business Administration Association, May, 2007.
- Crakes, G. with Cottrill, M. "More on "Pay for Performance"-The Disruptive Effect of Star Power in the NFL," Proceedings of the New England Business Administration Association, May, 2005.
- Crakes, G. with Crakes, A. "Education, Earnings, and the NCAA Student Athlete," Proceedings of the New England Business Administration Association, May, 2004.

Crakes, G. with Cottrill, M. and Crakes, J. "Context for the Medical Malpractice Insurance Debate," Proceedings of the Conference on Emerging Issues in Business and Technology, October, 2003.

Crakes, G. with Thorson, J. and Cottrill, M. "The Impact of Law Firm Concentration on Lawyers' Salaries," Proceedings of the New England Business Administration Association, April, 2000.

Crakes, G. with Thorson, J. and Cottrill, M. "Are Baseball Players Overpaid? An Analysis of Major League Baseball Salaries," Proceedings of the Northeast Business & Economics Association, October, 1998.

Crakes, G. with Cottrill, M. "The Connecticut State Income Tax and the Equal Sacrifice Rule," Proceedings of the New England Business Administration Association, November, 1997.

Crakes, G. with Cottrill, M. "Banking It Before the Bar: Legal Compensation Trends in Major Markets," Proceedings of the Northeast Business & Economics Association, September, 1997.

Crakes, G. with Cottrill, M. "Young and Old Scholars," Proceedings of the Eastern Case Writers Association/Eastern Academy of Management, May, 1994.

#### Abstracts

Crakes, G. and Doherty, N. "Costs of Public Dental Clinics Under Capacity Utilization," Journal of Dental Research (January, 1979).

#### Technical Reports

Doherty, N., Horowitz, P. and Crakes, G. "Analysis of Economic Factors Associated with Providing Incremental Dental Care to Children" for the National Institute of Health, United States Public Health Service, 1978.

#### Other

Economic Consultant, 4<sup>th</sup> edition, 1995, Recovery for Wrongful Death and Injury: Economic Handbook, Stuart M. Speiser and John Maher, Clark, Boardman, & Callaghan, New York, N.Y..

Economic Consultant (with J. Maher), 3<sup>rd</sup> edition, 1988 Recovery for Wrongful Death and Injury: Economic Handbook, Stuart M. Speiser, Bancroft, Whitney/Lawyers Cooperative Publishing, Rochester, N.Y..

Crakes, G.M. "CSUS Chief's Bonus Appalls," Hartford Courant, December 20, 2009.

Crakes, G.M. "Competition Causing Disagreement Over Deregulation," New Haven Register, August 6, 1981.

## Conferences

### Papers Presented

- Co-author of paper titled "Do Older Workers Respond to Incentives? Evidence From the Senior PGA Tour" (with M. Cottrill and J. Thorson, presenter) presented at the annual Connecticut State University Research Conference, October, 1999, Eastern Connecticut State University.
- Presented co-authored paper titled "The Intra and Inter-State Distribution of Dentists" (with T. Beazoglou and D. Heffley) at the annual meeting of the Eastern Economic Association, March 3, 1989 in Baltimore, MD.
- Co-author of paper titled "Determinants of Dentists' Geographic Distribution" (with T. Beazoglou and D. Heffley, presenter) presented at the meeting of the American Association of Dental Research, March 15, 1989 in San Francisco, CA.
- Presented co-authored paper titled "Estimating Dental Practice Production Functions with Alternative Output Measures" (with T. Beazoglou) at the annual meeting of the Eastern Economic Association, March 4-7, 1987 in Washington, D.C.
- Presented paper titled "A Comparison of Economic Estimates of Loss with Jury Awards and Pre-verdict Settlements" at the meeting of the Atlantic Economic Society, August 29 - September 1, 1985 in Washington, D.C.
- Presented co-authored paper titled, "A Re-examination of the Returns to Scale of Dental Practices" (with T. Beazoglou) at the annual meeting of the Eastern Economic Association, March 21-23, 1985 in Pittsburgh, PA.
- Presented co-authored paper titled "Economic Specification of Costs of Dental Programs" (with N. Doherty) at the annual meeting of the Eastern Economic Association, March 21-23, 1985 in Pittsburgh, PA.

### Other

- Chairperson of session, "Economics" at the annual meeting of the New England Business Administration Association, April, 1993 in New Haven, CT.
- Chairperson and organizer of session, "Health Economics" at the annual meeting of the Eastern Economic Association, March 28, 1992 in New York City, NY.
- Discussant of paper titled, "Massachusetts Hospitals in the Eighties: Financial Analysis of Large Urban and Other Hospitals" at the annual meeting of Northeast Business Economics Association, November 7, 1991 in Stamford, CT.

Discussant of paper titled, "Female Work Experience: Voluntary vs. Involuntary Labor Force Activity" at the meeting of the National Association of Forensic Economists, March 4, 1989 in Baltimore, MD

Discussant of paper titled "Diogenes' Expenses: The Costs to the Court of Seeking Truth in Medical Malpractice Cases" at the annual meeting of the Eastern Economic Association, March 12, 1988 in Boston, MA.

Discussant of paper titled "Present Value and the Structure of Interest Rates" at the meeting of the National Association of Forensic Economists, March 11, 1988 in Boston, MA.

Chairperson of session, "Topics in Health Economics" at the annual meeting of the Eastern Economic Association, March 11, 1983 in Boston, MA.

Discussant of paper titled "The Nursing Shortage and Its Associated Planning Problems" at the annual meeting of the New England Business and Economics Association, November 5, 1982 in Springfield, MA.

Coordinator and moderator for "The Role of Preventative Care: Is It a Healthy Alternative?" sponsored by the Joint Council on Economic Education, April 23, 1981, Southern Connecticut State College.